

Tyler Jay King
tyler@lawgroupfs.com
Franklin Square Law Group
700 12th St., NW, Ste. 700
Washington, DC 20005
Telephone: (202) 436-2641
Facsimile: (202) 478-0964

(pro hac vice)

Kevin Bons (OSB 066963)
kbons@beckley-law.com
Beckley & Bons, P.C.
66 Club Road, Suite 360
Eugene, Oregon 97440
Telephone: (541) 683-0888
Facsimile: (541) 683-0889

Attorney for Defendants Reality Kats, LLC
And Dennis Simpson

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ADEPT MANAGEMENT, INC., et, al.

Defendants.

CIVIL ACTION NO. 1:16-CV-00720-CL

Magistrate Judge Clarke

**THE SIMPSON DEFENDANTS’
REQUEST FOR LEAVE TO FILE
MOTION FOR SUMMARY
JUDGMENT**

Dennis Simpson and Reality Kats, LLC, (herein referred to as the “Simpson Defendants”), by and through the undersigned counsel, respectfully request permission to file a motion for summary judgment on the issue that the Simpson Defendants’ are not liable to the Plaintiff Federal Trade Commission (“FTC”) for any violation of the FTC Act resulting from the mailers and subscription business carried on by other defendants in this case.

DATED: May 25, 2018

Respectfully Submitted,

/s/

Tyler Jay King, Esq.
Franklin Square Law Group
700 12th St., NW, Ste. 700
Washington, DC 20005
(202) 436-2641
tyler@lawgroupfs.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 25, 2018, a copy of the foregoing was caused to be served to the pertinent parties of record in this matter, as follows:

By ECF on each of the following:

Laura M. Solis

lsolis@ftc.gov

Richard McKewen

rmckewen@ftc.gov

Connor Shively

cshively@ftc.gov

Federal Trade Commission

915 Second Avenue, Suite 2896

Seattle, WA 98174

David B. Paradis

dparadis@brophylegal.com

Brophy Schmor LLP

201 W. Main Street, 5th Floor

Medford, OR 97501

Kevin W. Bons

kbons@beckley-law.com

Beckley & Bons, P.C.

66 Club Road, Suite 360

P.O. Box 11098

Eugene, OR 97440

Shannon Bacon

sbrenee@gmail.com

Kirchoff Law Offices

231 NW B. Street

Grants Pass, OR 97526

Colleen M. Kaylor

Cmarie0322@yahoo.com

308 Live Oak Loop

Central Point, OR 97502

Laura Lovrien

ljlovrien@embarqmail.com

7610 Torrey Pines Ter.

Eagle Point, OR 97524

James E. Magleby

magleby@mcgiplaw.com

Eric K. Schnibbe

schnibbe@mcgiplaw.com

Adam Alba

alba@mcgiplaw.com

170 S. Main Street, Ste. 1100

Salt Lake City, UT 84101

Lydia Pugsley

Lydia@abdinc.biz

4293 West Main St.

Medford, OR 97501

By email and mail addressed to the address provided in Document 149 to the following:

Linda Babb
Gmamma910@gmail.com
440 Chateau Drive
Eagle Point, OR 97524

Noel Parducci
lovemyfourlittleones@gmail.com
103 Monterey Drive
Medford, OR 97504

William Strickler
Bilof541@gmail.com
2989 Thompson Creek Rd.
Jacksonville, OR 97530

Respectfully Submitted,

/s/

Tyler Jay King, Esq.